

July 14, 2022

W.K., et al v. Red Roof Inns, Inc., et al

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,  
D.P., A.F., C.A., R.K. and K.P.,

Plaintiffs,

vs.

RED ROOF INNS, INC.; FMW RRI  
NC, LLC; RED ROOF FRANCHISING,  
LLC; RRI WEST MANAGEMENT, LLC;  
VAHARI HOTEL, LLC; WESTMONT  
HOSPITALITY GROUP, INC.;  
and RRI III, LLC,  
Defendants.

**PL Sum. J.**  
**Ex. 016**

CIVIL ACTION NO.:  
1:20-CV-05263-MHC

VIDEOTAPED DEPOSITION OF K.P.

July 14, 2022

9:13 a.m.

1201 West Peachtree Street, Suite 3900

Atlanta, Georgia

Carolyn M. Carboni, RPR, RMR, CCR-B-878

Leo Mileman, Videographer

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11 On behalf of the Defendants Red Roof Inns, Inc.;  
12 FMW RRI NC, LLC; Red Roof Franchising, LLC; RRI  
13 West Management, LLC; Westmont Hospitality Group,  
14 Inc.; and RRI III, LLC:

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9 Also Present:

10 Tyler Greek

11 Michael R. Baumrind, Esquire (via Zoom)

12 Breanna Stovall (via Zoom)

13 Beth Richardson (via Zoom)

14 Cameron Ward (via Zoom)

15  
16  
17  
18 (Pursuant to Article 10(B) of the Rules  
19 and Regulations of the Georgia Board of Court  
20 Reporting, a written disclosure statement was  
21 submitted by the court reporter to all counsel  
22 present at the proceeding.)  
23  
24  
25

1 we'll take a break. I just ask that you answer the  
2 question that I've posed and then you can take a  
3 break, okay?

4 A Yes.

5 Q Have you taken any medications that may  
6 affect your ability to testify here today?

7 A No.

8 Q Have you taken any drugs that may affect  
9 your ability to testify today?

10 A No.

11 Q Do you have any medical conditions that  
12 may affect your ability to testify here today?

13 A No.

14 Q You claim in your lawsuit, [REDACTED],  
15 that you were trafficked at different hotels  
16 between 2010 and 2016; is that correct?

17 A Yes.

18 Q And you claim in your lawsuit that you  
19 were trafficked at the Red Roof at 1960 North Druid  
20 Hills Road, Atlanta, Georgia, between 2011 and  
21 2014; is that correct?

22 A Yes.

23 Q Okay. And we'll go through the timeline  
24 in a little bit more detail later on and show you  
25 some documents. But if I refer to this hotel as

1 A I have no idea.

2 Q And when was the last time you spoke to

3 [REDACTED]?

4 A Honestly, I talked to him as little as  
5 possible so --

6 Q It's fair to say you haven't --

7 A -- I have no idea. I have no idea. I  
8 avoided him.

9 Q And fair to say you haven't spoken to him  
10 since at least 2016?

11 A Oh, yeah, yes.

12 Q And when you say you avoided him, was  
13 there something in particular about him that you --

14 A I avoided all of these people.

15 Q And when you say you avoided all of these  
16 people, was this at the time of the alleged  
17 trafficking or later?

18 A I -- yes, later, I definitely avoided  
19 them. But during trafficking, I was instructed not  
20 to engage with these people unless I was instructed  
21 to engage with them. So avoided them for my own  
22 safety and at the instruction of my trafficker.

23 Q And when you say at the instruction of  
24 your trafficker, you're referring to Tricky?

25 A Yes.

1 Q And why not?

2 A Because it was a client. If you tell  
3 clients that you have an overseer of some sort,  
4 they are less likely to engage.

5 Q And when you say "less likely to engage,"  
6 you mean less likely to have sex and pay?

7 A No. I mean, engage at all in anything.  
8 Whether that is talking, developing a, you know,  
9 some kind of mutual agreement or whatever you'd  
10 like to classify as that, yeah, you don't -- you  
11 did not disclose that information. It would not  
12 fare well for business.

13 Q And business was commercial sex, right?

14 A I was sex trafficked.

15 Q I understand that, ma'am.

16 A So it was not commercial sex.

17 Q I understand that. And I don't want to,  
18 you know, argue with you on the definition. But  
19 whether you kept the money or not -- I understand  
20 that your testimony is that you gave all the money  
21 to T, correct?

22 A Yes.

23 Q You never kept it. So my question was,  
24 you know, the business -- you just said "business."  
25 The business was you were having sex and people

1 the other plaintiffs we've discussed?

2 A Sorry for interrupting. I think her and I  
3 were fairly decent friends. But when you're being  
4 trafficked, there's lots of extenuating  
5 circumstances. And so traffickers will often pit  
6 you against one another. And so I don't know if we  
7 didn't remain friends because of something that was  
8 said or some kind of barrier that was put in  
9 between us because of other people or if we just  
10 lost closeness. I mean...

11 Q You don't -- as you sit here today, you  
12 don't recall any specifics of whether they pit you  
13 against each other, as you just mentioned?

14 A When are you talking about and with who?  
15 Are you talking about specifically with [REDACTED] --

16 Q Right, right. We're talking about [REDACTED]  
17 [REDACTED].

18 A -- or during trafficking?

19 I don't -- I was not privy to what was  
20 being used or said to pit us against each other, so  
21 I have no idea if something was said to [REDACTED].

22 I didn't have anything that was said to me  
23 about me remaining friends with her, but on her  
24 end, I don't know, and I wouldn't know, you know,  
25 how that would have happened.

1 Q And you also said there is extenuating  
2 circumstances, what do you mean by that?

3 THE WITNESS: So can you repeat what I  
4 said, please?

5 MR. ALLUSHI: That's fine.

6 (The record was read by the court reporter  
7 as follows:

8 Answer: "I think her and I were fairly  
9 decent friends. But when you're being trafficked,  
10 there's lots of extenuating circumstances.")

11 MR. ALLUSHI: That's good.

12 A Yes. So the extenuating circumstances  
13 were there were many, many, many, many things that  
14 were out of my control. And I -- there were many  
15 moving parts to this situation that were happening.  
16 I -- there were just lots of things happening, many  
17 moving parts. I can't account for all of them,  
18 but...

19 BY MR. ALLUSHI:

20 Q Can you give me one of them?

21 A That's such a broad question, I guess. I  
22 don't -- are you asking -- well...

23 MR. ALLUSHI: Yeah. Objection.

24 Nonresponsive.

25 BY MR. ALLUSHI:



1 Q You said extenuating circumstances, and my  
2 question was: What are those extenuating  
3 circumstances, ma'am?

4 A I guess I just don't really understand  
5 what you mean. I mean, I don't follow at all.

6 Q Sure. I was asking you about your  
7 relationship with this [REDACTED]

8 A Sure.

9 Q You said during your alleged trafficking,  
10 there was extenuating circumstances that affected  
11 the relationship.

12 My question is very simple: What are  
13 those extenuating circumstances?

14 A Well, there were people controlling our  
15 ability to maintain what I would consider a normal  
16 friendship.

17 Q How so?

18 A There are people -- traffickers are very  
19 manipulative. So one of the tactics that was often  
20 used was to pit women against each other because if  
21 we're squabbling, we're not as concerned with or  
22 aware of what is actually happening. I mean, our  
23 traffickers muddled the waters.

24 Q In relation to [REDACTED], though, they  
25 weren't able to do that, right?

1 A Oh, they tried.

2 Q They didn't succeed?

3 A No, not really.

4 Q And what was so different with [REDACTED]  
5 then?

6 A [REDACTED] and I didn't spend as much  
7 time together.

8 Q The next person listed here is [REDACTED],  
9 and you say [REDACTED] was a victim of sex  
10 trafficking. Do you know if [REDACTED] stayed at the  
11 Buckhead Red Roof with you?

12 A No. I don't recall her being there with  
13 me, but I have no idea.

14 Q Do you recall [REDACTED] last name?

15 A No idea.

16 Q Can you describe [REDACTED], please?

17 A She was taller than me, thinner, very  
18 thin, I think. I remember her having bright red  
19 hair. And she was white and very wild-eyed.

20 Q Were you friends with [REDACTED]?

21 A No.

22 Q Did you ever -- do you recall  
23 communicating with [REDACTED] via social media?

24 A No.

25 Q And when was the last time you believe you

1 mother.

2 Q Okay. And you said -- you said 2012 --  
3 did you stay -- did you spend the entire 2012 at  
4 this house here or part of it, do you recall?

5 A I don't. I don't.

6 Q What was your relationship like with  
7 [REDACTED] parents?

8 A It was cordial.

9 Q Did you ever tell them that their son was  
10 forcing you to get paid for your time, as you call  
11 it?

12 A No.

13 Q Why not?

14 A I was scared to tell anyone.

15 Q Scared of who?

16 A My trafficker and the police.

17 Q Okay. So your testimony here under oath  
18 is that you were scared of [REDACTED]?

19 A Yes.

20 Q Okay. Did he ever threaten you?

21 A Yes.

22 Q Said what?

23 A There were multiple threats of different  
24 things. For example, he threatened to tell my  
25 parents -- or my mother what was happening, so...

1 Q Okay. Any other threats?

2 A Yeah. Like, he's going to beat me up or  
3 kill me or whatever. I mean, very violent threats  
4 about, you know, harming me or outing me in some  
5 way, like, to my job, et cetera.

6 Q Did he ever beat you?

7 A Yes.

8 Q How many times?

9 A I couldn't give you a number. It was a  
10 lot.

11 Q More than five?

12 A Yes.

13 Q More than 10?

14 A Yes, for sure.

15 Q More than 20?

16 A I couldn't give you a number. I mean...

17 Q Did you ever press charges for the  
18 beating?

19 A No.

20 Q Why not?

21 A Because as I stated before, I felt like he  
22 was my baby's father. I felt, you know...

23 Q Did you love him?

24 A Yes.

25 Q Do you still love him?

1 being a person's body not properly cared for, my  
2 body was not properly cared for. But was I  
3 underweight? No.

4 Q And you said you were in poor physical  
5 state, right?

6 A Yes.

7 Q What does that mean?

8 A So if you look at pictures of me from that  
9 time, I often had extremely dark circles under my  
10 eyes to the point where my -- I just looked  
11 incredibly pale and sleep deprived. I did not feel  
12 physically fit.

13 Q The physical state that you appeared to  
14 Mr. Schatten would have been the same physical  
15 state you appeared at the Red Roof hotel, right?

16 A My physical body wasn't different, but the  
17 way that I presented myself to Mr. Schatten and the  
18 way that I would have appeared at the Red Roof  
19 would have been different.

20 Q You're talking about clothing or you're  
21 just talking about --

22 A Sure.

23 Q -- physical appearance?

24 A Yes. Clothing, demeanor, any of those  
25 types of things, yes, hair, makeup, et cetera.

1           A       He tried to get me to engage in sex  
2       trafficking.

3           Q       Well, it says here, "Diablo tried to talk  
4       K.P.," which is you, "into working for him as a  
5       commercial sex worker."

6                   That's the words you used, right?

7           A       Okay. He -- my answer does not change  
8       from this --

9           Q       Right.

10          A       -- this packet, so yes.

11          Q       And you said no to him?

12          A       Yes.

13          Q       Okay. And how did you meet [REDACTED]?

14          A       Through mutual friends of Diablo's and  
15       [REDACTED].

16          Q       And who were those mutual friends?

17          A       Kwan's mother, [REDACTED].

18          Q       And it states here that she was watching  
19       your son at times?

20          A       Yes, she did.

21          Q       And was Diablo and [REDACTED] friends?

22          A       I don't think that they were friends, but  
23       they were associates.

24          Q       And what do you mean "associates"? Were  
25       they in the business of sex trafficking?

1 A He was a part of PIVIP as was [REDACTED].

2 Q And do you recall specifically who  
3 introduced you to [REDACTED]? Was it [REDACTED] or was it  
4 Kwan or...

5 A I believe it would have been [REDACTED] --  
6 yeah, [REDACTED].

7 Q What was [REDACTED] last name?

8 A I assume it was R[REDACTED], but I cannot be  
9 100 percent certain of that.

10 Q Do you remember meeting [REDACTED] the first  
11 time?

12 A No.

13 Q What's the first recollection you have of  
14 [REDACTED]?

15 A He was with [REDACTED], and that may have  
16 been the first time we met. I think maybe it was.  
17 But I, you know, may have met him in passing prior  
18 to then. But that first real recollection I have  
19 of him is when he was with [REDACTED].

20 Q And where were they?

21 A I picked them up somewhere. I don't  
22 really remember where.

23 Q And where did you all go?

24 A I don't remember.

25 Q Did you think [REDACTED] was his girlfriend

1 [REDACTED] ?

2 A Well, he lived with me, so I felt like it  
3 was more -- he lived with me, and I was willing for  
4 him to live with me. So maybe by the end of 2010.

5 THE WITNESS: Can I have some mints?

6 MS. MYKKELTVEDT: Yes.

7 THE WITNESS: Thank you.

8 BY MR. ALLUSHI:

9 Q And at what point did he start asking you  
10 to engage in commercial sex?

11 A Well, [REDACTED] did not ask me outright  
12 to -- when I was ready to be trafficked. He --

13 Q Okay. When did he -- did he tell you?

14 A That isn't how it worked.

15 Q Tell me how it worked.

16 A So I was exposed to this lifestyle, and I  
17 was brought around girls who were being -- or women  
18 who were being trafficked, and I was what I would  
19 refer to as groomed for several months prior to  
20 when I began actually being trafficked and seeing  
21 clients.

22 Q And what do you mean by you were being  
23 groomed?

24 A So there was a lot of background  
25 manipulation that occurred; for example, the



1 exposure to other girls, making this lifestyle seem  
2 enticing in some way. I was manipulated.

3 Q How did they make it sound -- how did they  
4 make it appear enticing, the lifestyle?

5 A Everyone is beautiful. And when you  
6 first -- when you first come in, everyone appears  
7 to be happy and jovial, and they look good. They  
8 smell good. They dress nicely. They, you know,  
9 are around people with money. It is -- it almost  
10 seemed glamorous.

11 Q How long was the grooming period,  
12 [REDACTED]?

13 A I would estimate probably like six months,  
14 but I also should include that my exposure to  
15 Diablo may need to be included in that time frame.  
16 So probably almost a year if we're including the  
17 time with Diablo as well because, obviously, he  
18 introduced me to these people, so...

19 Q Did you see any client -- did you see any  
20 clients in 2010? Did you actually have money for  
21 sex in 2010? Were you forced into trafficking in  
22 2010, whichever way you want to call it?

23 A So I don't know. I can't recall when the  
24 first instance occurred, and, you know...

25 Q So the first time that you were forced to

1           A       I never told any employee of any hotel  
2       that I was being sex trafficked.

3           Q       During the trips that we talked about in  
4       Florida, North Carolina and Baltimore, was [REDACTED]  
5       with you?

6           A       Yes.

7           Q       All trips?

8           A       Yes.

9           Q       During the entire time that you allege you  
10       were trafficked between 2010 and 2016, did you ever  
11       keep the money from the time, as you call it, with  
12       your client?

13          A       No.

14          Q       You always gave that money to [REDACTED]?

15          A       Yes. It was an obligation.

16          Q       But during the -- during the stays at the  
17       Red Roof Buckhead, was [REDACTED] with you there?

18          A       He would have been at some points.

19          Q       And where was your son?

20          A       He may have been with my mother because he  
21       at some point went to live with my mom. But he may  
22       have also been at a nanny or [REDACTED].

23          Q       Did he ever stay home with [REDACTED]?

24          A       Yes.

25          Q       Was there a time when you were seeing

## 1 CERTIFICATE

2 STATE OF GEORGIA:

3 COUNTY OF FULTON:

4 I hereby certify that the foregoing  
5 transcript was taken down, as stated in the  
6 caption, and the colloquies, questions and answers  
7 were reduced to typewriting under my direction;  
8 that the transcript is a true and correct record of  
9 the evidence given upon said proceeding.

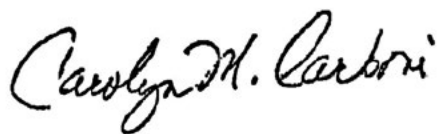
10 I further certify that I am not a relative  
11 or employee or attorney of any party, nor am I  
12 financially interested in the outcome of this  
13 action.

14 I have no relationship of interest in this  
15 matter which would disqualify me from maintaining  
16 my obligation of impartiality in compliance with  
17 the Code of Professional Ethics.

18 I have no direct contract with any party  
19 in this action and my compensation is based solely  
20 on the terms of my subcontractor agreement.

21 Nothing in the arrangements made for this  
22 proceeding impacts my absolute commitment to serve  
23 all parties as an impartial officer of the court.

24 12.



25 CAROLYN M. CARBONI, RPR, RMR, CCR-B-878